

**IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA
IN AND FOR THE SIXTEENTH JUDICIAL CIRCUIT**

**Trenton Rogers Garmon,
Garmon Minors (SG, JG, JG, & SG)
Plaintiffs & Affiant,**

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v.

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Case Numbers:**4:23-cv-01525-CLM**

**Google LLC & Alphabet Inc.
doing business as “Google”,**

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Defendants.

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**PLAINTIFFS’ FIRST MOTION FOR PARTIAL SUMMARY JUDGEMENT
AND STIPULATION TO PROPER DEFENDANT**

Comes now the Plaintiffs and do file this Motion for Partial Summary Judgment and herein do stipulate to the dismissal of any improper Corporate Defendant without prejudice. Plaintiffs do intend to pursue the matter only against the proper Corporate Defendant(s) which appears to be Google, LLC. Notwithstanding such Plaintiffs stipulate to the Defendant’s Motion to Dismiss to the extent any representations as to ownership and control, the proper entity per Law are asserted thus rendering a good faith dismissal due. In an action for libel or slander, the plaintiff must prove, unless it shall be admitted by the defendant, the

facts showing that the alleged defamatory matter was published or spoken of the plaintiff.¹ In Alabama, defamation of character is defined as:

- Any false, public and negligent speech that degrades, projects hate or ruins a person's reputation.
- The plaintiff must prove that the defendant committed an act of defamation.
- The defamation statute of limitations in Alabama is two years.
- For a statement to be considered defamatory, the following must be true: The statement is false, the statement was published, such that a third party saw or heard it, the statement caused injury to a person's reputation, and the statements are unprivileged, such that it is not protected by the laws of the first amendment.

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Southbark, Inc. v. Mobile Cnty. Comm'n, 974 F. Supp. 2d 1372, 1376 (S.D. Ala. 2013) (“ “To demonstrate standing, a plaintiff must show that ‘(1) he has suffered, or imminently will suffer, an injury-in-fact; (2) the injury is fairly traceable to [the actions of the Defendants]; and (3) a favorable judgment is likely to redress the injury.’ ” *Florida ex rel. Atty. Gen. v. U.S. Dept. of Health and Human Services*, 648 F.3d 1235, 1242–43 (11th Cir.2011) (*quoting Harrell v. The Florida Bar*, 608 F.3d 1241, 1253 (11th Cir.2010)), *reversed, in part, sub nom. National Federation of Independent Business v. Sebelius*, — U.S. —, 132 S.Ct. 2566, 183 L.Ed.2d 450 (2012). “ ‘The plaintiff bears the burden of establishing each of these elements.’ ” *Florida ex rel. Atty. Gen.*, 648 F.3d at 1243 (*quoting*

¹ Section 6-5-182 - Libel or slander - Burden of proof

Elend v. Basham, 471 F.3d 1199, 1206 (11th Cir.2006)). ”) *Southbark, Inc. v. Mobile Cnty. Comm'n*, 974 F. Supp. 2d 1372, 1380 (S.D. Ala. 2013) (“SouthBARK claims § 1983 defamation under the “stigma plus” test. The U.S. Supreme Court has stated that, in examining a § 1983 action, one must look to see that the two essential elements are present: “(1) whether the conduct complained of was committed by a person acting under color of state law; and (2) whether this conduct deprived a person of rights, privileges or immunities secured by the Constitution or laws of the United States.” *Parratt v. Taylor*, 451 U.S. 527, 535, 101 S.Ct. 1908, 68 L.Ed.2d 420 (1981), *overruled in part on other grounds*, *Daniels v. Williams*, 474 U.S. 327, 330–331, 106 S.Ct. 662, 88 L.Ed.2d 662 (1986).”)

Southbark, Inc. v. Mobile Cnty. Comm'n, 974 F. Supp. 2d 1372, 1381-82 (S.D. Ala. 2013) (““The general definition [of defamation] may be said to include whatever tends to injure the character of an individual, blacken his reputation, or imputes fraud, dishonesty, or another moral turpitude, or reflects shame, or tends to put him without the pale of social intercourse.” *Bowling v. Pow*, 293 Ala. 178, 301 So.2d 55, 59 (1974). A *prima facie* case of defamation, under Alabama law, requires that a plaintiff show “that the defendant was at least negligent [] in publishing a false and defamatory statement to another concerning the plaintiff [] which is either actionable without having to prove special harm (actionable *per se*)

or actionable upon allegations and proof of special harm (actionable *per quod*).” *Nelson v. Lapeyrouse Grain Corp.*, 534 So.2d 1085, 1091 (Ala.1988) (citations omitted). Publication requires communication of the defaming statement to only a single third party. *See Brackin v. Trimmier Law Firm*, 897 So.2d 207, 221 (Ala.2004).”) *Southbark, Inc. v. Mobile Cnty. Comm'n*, 974 F. Supp. 2d 1372, 1382 (S.D. Ala. 2013) (“In some instances an individual may achieve such pervasive fame or notoriety that he becomes a public figure for all purposes and in all contexts. More commonly, an individual voluntarily injects himself or is drawn into a particular public controversy and thereby becomes a public figure for a limited range of issues. In either case such persons assume special prominence in the resolution of public questions. *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 351, 94 S.Ct. 2997, 41 L.Ed.2d 789”) *Southbark, Inc. v. Mobile Cnty. Comm'n*, 974 F. Supp. 2d 1372, 1382 (S.D. Ala. 2013) (“The United States Supreme Court has stated that when someone speaks with “actual malice,” it means that the person is speaking “with knowledge that it was false or with reckless disregard of whether it was false or not.” *New York Times Co. v. Sullivan*, 376 U.S. 254, 280, 84 S.Ct. 710, 11 L.Ed.2d 686 (1964).”)

State Common Law Defamation are present as in Southbark, Inc. v. Mobile Cnty. Comm'n, 974 F. Supp. 2d 1372, 1387 (S.D. Ala. 2013) (“(State common law defamation). ”) There is no dispute of material fact regarding the matters herein

asserted and the Plaintiffs are entitled by law to a Partial Summary Judgment.

Plaintiffs move for a Partial Summary Judgment finding:

1. The proper corporate Defendant based upon the representations of the Motion to Dismiss filed is Google, LLC for all services at issue,
2. The proper legal category of the Defendant depends upon the service at issue as (i) a Search Engine Company with regards to the providing of a search result in regards to that Google Service, (ii) a Digital News Outlet given the Genitive News AI being utilized as well as references in defensive arguments to the *Sullivan* standard in regards to that Google News Service section which is separate and distinct, and (iii) a “Data” or otherwise “Host” with regards to the Knowledge Panel Google Service as the Defendant acknowledged that It controls and user control the information inputted into this section of the Google Platform, not another hosting provider.
3. A partial summary judgment of fact that Google displays information about Garmon *per se* that is arguably inaccurate regarding Trenton Garmon being currently married which Google has stipulated to the Knowledge Panel listing which it controls as “m.2009” and only due to be decided are damages or the proper legal relief considering the notice provided which Garmon. Garmon asserts online notices and correction requests were made by a webprofessional and individually proof of which he claims he will

present to a Jury as part of his allegations that Google intentionally ignored updating accurate information. Summary Judgment regarding the Knowledge Panel “hosting” on Google and *per se* that it lists: “m.2009” while Garmon has provided Annulment information and other Knowledge Panels indicate a change in status.

4. The Plaintiffs do move for a finding of fact that the “Holy Water” case article found on AL.com² is completely excluded from Google News search while a Jury is due to determine the facts regarding malice and or other tortious intentions and damages related. This is a positive professional article, among others, completely and intentionally excluded by the Perpetuated Defamatory Algorithm.
5. The Plaintiffs move for a partial summary judgment that the Google hyperlink to AboveTheLaw which purports to be an “article” which is a single line simply stating with a picture: “Stephanie Ruhle Shows How White Allies Are Supposed To Act By Live-Dragging Trent Garmon, Roy Moore's Lawyer³ **Trent Garmon tried to come at Ali Velshi with some dog-whistle bigotry, but the co-host was having none of it.**”⁴ This is the exact concern of string code non-sense that is warned of online by legal

² https://www.al.com/breaking/2013/04/accused_holy_water_sprayer_joy_2.html

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<https://abovethelaw.com/2017/11/stephanie-ruhle-shows-how-white-allies-are-supposed-to-act-by-live-dragging-trent-garmon-roy-moores-lawyer/>

⁴ Word-for-Word of a purported “News” article without Bold emphasis added.

experts and tech ethics bloggers. No context, simply attacks in one to two sentence format and calling it “News” or an article. Per *e-ventures Worldwide, LLC v. Google, Inc.*, 188 F. Supp. 3d 1265, 1277 (M.D. Fla. 2016) (“[D]efamation... recognizes the concept that literally true statements can be defamatory where they create a false impression.” *Id.*) This statement is not a “Publication” and provides not “helpful” intention in the organization of information online. Rather is defamation.

The Genitive AI News Algorithm and hence Defendant is subject to a defamation standard by law. Subject wherein defamation has been asserted and the purported articles prove to not be “helpful” or objectively true, but are actual “fake news” or otherwise attack articles. Times have changed since *Sullivan* as the advent of the internet and webcrawlers was not even appreciable.

For the purported “News”, per *Zhang*, that comes under scrutiny may be considered following the burden shifting of filing suit; there is no absolute shield over the algorithm weight decisions. There is no legal presumption impenetrable that an outlet which claims to be a “News” outlet simply is afforded *Sullivan* protection. If afforded *Sullivan* protection, the article itself still comes under review as to whether its contents is untrue or malicious. The two sentence “page” with

pictures and the Plaintiff Trenton Garmon's name is not a traditional Publication or even a journalism minimum length "Article". But rather a very clear two sentence "anti-white" rant out of context and not objectively true.

That is the legal standard. In this case, Google News is not merely displaying and representing "news" rather it is by design dragnetting, as even indicated on one of the "fake news" two sentence "articles" it links to in this action, individuals who are Social Scored with malicious intentions. To be news the objective reading must leave one believing the article was "helpful" so says, *Sorrell and Zhang*.

In fact Zhang clearly states to be news or a publication, the material must be "relevant information" and "helpful" to the searcher. *Jian Zhang v. Baidu.Com Inc.*, 11 Civ. 3388 (JMF), 7 (S.D.N.Y. Mar. 27, 2014) ("The central purpose of a search engine is to retrieve **relevant information** from the vast universe of data on the Internet and to organize it in a way that would be **most helpful** to the searcher. In doing so, search engines inevitably make editorial judgments about what information (or kinds of information) to include in the results and how and where to display that information (for example, on the first page of the search results or later). This case is from 2014 and recognizes "editorial decisions" while being

decided on and published pre-Genitive AI and even before Autosuggestion in the search bar panel was even offered.

See generally Eric Goldman, *Search Engine Bias and the Demise of Search Engine Utopianism*, 8 Yale J.L. & Tech. 188, 192 (2006) (concluding that "search engines make editorial judgments just like any other media company"). In these respects, a "search engine's editorial judgment is much like many other familiar editorial judgments," such as the newspaper editor's judgment of which wire-service stories to run and where to place them in the newspaper, the guidebook writer's judgments about which attractions to mention and how to display them, and Matt Drudge's judgments about which stories to link and how prominently to feature them. Volokh & Falk, *supra*, at 884; *accord* Benjamin, *supra*, at 1467-71. ") Note is made that the development of AI which summarizes and orders news based on algorithm is ever very different from Matt Drudge's platform terming and posting of hyperlink decisions. This is a "machine" coded and programed to evaluate, critique and weight pre-programed "factors" which may or may not be "malicious" but are due discovery, and believed to that a jury will find weighted factors to be malicious and an intentional part of a Perpetuated Digital Defamation in this case and other situations which should be redressed and mitigated by Partial Summary Judgement and the damages set for trial after discovery.

Thus, it is evident that noticed, links to Pure Spam are tolerated by Google which provide clearly no “helpful” or objectively organizational intention but merely are designed to attack Plaintiff father and minors indirectly, isogeting “white-alliance” against women⁵ who are of the same race; (2) Knowledge Panel negligence being in contract and otherwise agreement by way of the user agreement or alternatively breach of contract for incorrect, unrevised or unmitigated incorrect information and (3) the news summation algorithm which acts effectively like the search engine algorithm but rather prioritizes news outlets clearly therein intentionally by a malicious intention by rational deduction has suppressed positive articles from larger outlets while displaying fake news, false reports and framed arrests.

Note that the Plaintiff Trenton Garmon was identified as a “Prominent Civil Rights Lawyer” by a reporter named Brandon Moseley. Thus, there is zero presumption rather citation of the prior utilized term which fairly and at least accurately depicts the professional intentions of the Plaintiff father. Same provides

⁵ Garmon disclaimed any alleged behavior as inappropriate if true and accurate in the underlying professional case upon which the defendant has linked the Spam anti-white man and people attack page, which is clearly not a two sentence actual legal “Publication”.

all the more basis to understand and analyse the intentionally defaming news algorithm of the Defendant Google for which it is responsible.

Google would have the Court to believe that none of the claims have any merit. Garmon herein stipulates that Google is entitled to the protections set out by the *stare decise* defamation law and also is liable for the damages when the elements are met. Google is, in fact, due the protections of the communications decency act and yet is also responsible to the minimum standards of revising and amending following due notice and otherwise not communicating information it knows to be patently false or should know to be false or is later made aware to be false. Google is, also entitled to the defenses in a standard negligence claim and additionally in a breach of contract claim, which has yet to be pled. Albeit Google is also responsible for the damages caused should it be found, which a jury will, that Google has a duty and that It breached that duty and caused damages. The Defendant Google has a duty not to intentionally suppress objective, truthful articles specifically from credible news outlets based upon the contract engaged not merely in maintaining a Google account via Gmail, Google Suites and by Knowledge Panel claimed ownership.

But Google news owes a duty per the *New York Times v. Sullivan* case not to reprint defaming material or material it knows or should know to be untrue and

casts a false light with an intention to be defaming. The company is not simply using an Editor to select News articles and or text. The company is not simply returning results of other news outlets without any criteria of selection, but rather Google is utilizing Genitive AI or “Intelligence Search Algorithm”⁶ to not simply provide a hyperlink or editorial selected section of an article. Rather Google, the Geneitive New AI Service is providing “string texts” or “text strung together” of not random, but criteria selected Social Score weighted and viewpoint articles. This includes purported “attack” articles being “web crawled” and displayed on Google search results as “News” while the is literally zero legal or fact base substance, merey defaming adjectives and miscontextualized attacks.

To wit: “Stephanie Ruhle Shows How White Allies Are Supposed To Act By Live-Dragging Trent Garmon, Roy Moore's Lawyer⁷ **Trent Garmon tried to come at Ali Velshi with some dog-whistle bigotry, but the co-host was having none of it.**” This is the exact concern of string code non-sense that is warned of

⁶ “Intelligent search combines techniques including natural language processing and machine learning. For example, it can make connections between semantic terms that a traditional search engine (one that's simply looking at keywords) would be unable to discern.” May 24, 2022 <https://www.algolia.com>

⁷ <https://abovethelaw.com/2017/11/stephanie-ruhle-shows-how-white-allies-are-supposed-to-act-by-live-dragging-trent-garmon-roy-moores-lawyer/> - Per Sorrell 564 US 552 the disseminated info to be deemed news must be “helpful” to a reader. “White allies” is not helpful to understanding a case involving all purportedly “white” people. “Bigotry” is not helpful when considering the interviewer is Muslim whose faith accepts child marriage and arranged marriages, while all the individuals involved in the actual case are “white” and purported Christians, thus not per objective academia believing it moral and right to engage in child marriage or arranged marriages. Thus the “Article” or “News” is neither accurate or helpful, rather is a complete spin to attack defaming of the Plaintiff.

online by legal experts and tech ethics bloggers. No context, simply attacks in one to two sentence format and calling it “News” or an article. This is a political agenda article Google grabs by way of Its webcrawlers because of the Perpetuated Defamation algorithm factors. What is the “dog-whistle bigotry”? Unclear, but perhaps discussing the cultural practice of a southern Christian couple which typically would have the young man ask the parents for the daughter hand in marriage, offends without being said Ali Velshi who is a Muslim and by faith would believe in arrange marriages.

Hence, even what is being considered “bigotry” is untrue⁸ and the practice presumed as being bigotous of arranged marriages is not endorsed by Garmon, but in religious practice accepted by the interviewer. “In all actions of slander or libel, the truth of the words spoken or written or the circumstances under which they were spoken or written may be given in evidence under a general denial in mitigation of the damages.” White-ally alliance against another “white” in a case not related to race in any regard - is false light and defamation - still unmitigated⁹. Hence the purported “article” provides zero fact or quotation or otherwise basis for the two-line smear page but that is clearly what it is, not traditional “News”. And

⁸ Everyone in the underlying action was Caucasian which is presumably “white” in AboveTheLaw’s categorization.

⁹ Section 6-5-183 - Libel or slander - Mitigation of damages - Evidence of truth or circumstances

Google links to hundreds of millions of two to three line “News” articles like this for people all across the Globe.

As to the mechanics, please note that the search engine and the knowledge panel and the news summation are three different functions which require different digital gates and thus are due different legal standards - correct. Yet Google cannot and must not evade liability wherein the proper gate and proper company has been proven to violate the appropriately applied civil law - which most strongly in this case is the news summations *res ipsa locutor* total suppression of the “Holy Water” case article. That among other articles, indicates clearly that the site is not seeking to simply “summate” the news, rather the News Summation Beast is seeking to exclude and eliminate any links to the relevant, objective, credible site news article. It is not mere circumstantial, it is algorithmic with weighted factors controlled by Google which have Social Scoring using some 200 factors which are due discovery.

The articles excluded by Google’s News digital gateway algorithm speaks for itself with regards to results - It intentionally created no link to the positive news article by very design - which the other news site search giants can be proven as plumb line objective comparison - to not be doing. Responses by Garmon are also excluded and ignored.

Google is thus denying that Garmon is a Public Figure by refusing to list publish his responses while also asserting no responsibility for the “weight of factors” its algorithm considers. Google has links to “fake news” which are not actual “News Outlets” intended to be protected by Sullivan, but are a web of string defamation of Perpetuated Defamation. If one is a public figure it is presumed by law that his or her words and disseminations in rebuttal are accepted in the general news stream or at least equally to that which is being rebutted and otherwise afforded an equal reflection or due reflection in the appropriate mediums. A politician has a certain amount of time on the floor. A judge has a certain docket and if attacked in the media with a four hundred word article would not be expected to be considered afforded a fair response if his or her press release was not listed, was suppressed or otherwise was “news summarized” into only a few words. Much less if two to three sentences of factless attack by adjective was made upon which is the case in this situation with the AboveTheLaw two line rant against Garmon calling him “white” and a “bigot”.

In this case, Garmon’s news summation of responses are not even listed while Google claims he is in fact a Public Figure. Either Garmon is a public figure and Google has maliciously attacked him by removing a leg from the stool and while linking attack posts such as the two sentence “news” rant on AboveTheLaw.com while claiming no responsibility for Its algorithm is clearly

defaming by design of suppressing and rejecting AL.com articles which reflect a positive light. That is exactly the algorithmic behavior intended to be curved and redressed by the legal doctrine of Perpetuated Defamation.

Or Garmon is not a public figure and Google is *negligent* suppressing (1) objective articles such as that of AL.com regarding the Holy Wather case and (2) press release articles designed to mitigate personal medical information which became subject to criminal prosecution.

Garmon self-identifies without boasting nor embarrassment per se as on the autism spectrum. Blind as a mole, he has acute hearing tested by the United States Army in Huntsville Alabama and having an intelligence quotient equivalent to a photo graphic memory in a three time lagged test conducted by a Navy PhD which required rendering drawings of elements wherein the general quotient mind over time deteriorates as to certain details. The examiner said he could not tell the difference in which picture was drawn at the onset while the subject image was visible, which was drawn minutes later and which was drawn over an hour later - as all three were identical - thus equating to “no higher score”. And yet Garmon is unable an entire week to not suffer from nocturnal incontinence and daily has spectrum cramps in his hands, wrists, feet, shins, legs, back and neck.

Wherefore medical information of “Drug Charges” without the “Prescription” response, along with his chronic physical pain from multiple orthopedica surgeries, was suppressed and Google News Summation and search engine in general only published a partial context of a framed arrest story with an intention to mock or suppress by algorithm the Plaintiff the primary reason upon which is due discovery. It is believed the most inflamed term being suppressed by the algorithm is “Catholic” followed by “pro-life” and then perhaps other generally accepted world views which make per se the defendant apparent in Its scheme to exclude by design. Or Google has a former client or political cause of Garmon coded in a Social Scoring Algorithm which is due legal scrutiny. Which is the essence of the case - the “weight factors” *per se* and by *de facto* evidence are indicating a suppression and complete exclusion - which no one has offered a “why”.

Discovery will reveal the factors or factor which led to the “Holy Water” case being completely suppressed from the News Summation digital gateway of Google, and the Plaintiffs are entitled to such. Discovery will also reveal why the medical rebuttal which for a professional, especially an honorably discharged Vet of the U.S. Army matters, as his “behaviour” and possession of medication or a “substance” was believed to be legal and served a practical purpose. Even if the criminal implications are disputed notwithstanding the very clear Full Faith &

Credit Doctrine - suppressing the response of a “Medical Cannabis” or “Cannabis Prescription” completely while same is listed on AL.com is malicious by intentionally algorithm exclusion and is a question due to be determined by a jury both as to its tort and damages. Discovery is due objectively to better understand what “weight factors” Google considers for everyone in Its clearly Social Score or otherwise intentionally coded algorithm. Then arguments that those factors are not “malicious” may be forthcoming from the Defense. Even online journalism from Gfile.News and TrentonGarmon.info were ignored by the Webcrawlers of Google, LLC given the negative algorithm social scoring of select groups and criteria within which the Plaintiffs were placed.

These distinctions are due discovery to determine how the factors are weighed and if there are any “bias” or “discriminator” factors that are considered which would be per se malicious if based upon religion, perceived race or another form of a protected class upon which ill will is harbored by political groups and even corporations, such as Google. Would google offer that if an article about a native American tribe was intentionally excluded vindicating its property rights - would that if excluded be considered malicious? Would Google consider it malicious to intentionally exclude the contexts of Dr. Martin Luther King’s

Birmingham¹⁰ jail letter. Garmon also notes the prejudice of race baiting against “White People” by the Defendant’s algorithm is perpetuated. His career and life in ministry bear witness of a clear service to the disenfranchised and equal rendering of legal services. His personal life from Athletics indicate a reasonably neutral and objective diversity of relationships and friendships which are negatively affected and damaged in part due to the negative algorithm patterns of Google, LLC.

In support thereof, the Plaintiffs do stipulate as herein stated to the facts asserted by Google regarding the three services or digital gateways provided (1) general search algorithm based, (2) knowledge panel with direct oversight and control of the information and requests for modification and (3) the news summation algorithm to include the weight factors of ordering first to last and cardinal or value consideration by excluding. Google has recognized that ordinal or in the order selected results exist and that cardinal or the weight of the matters to include or otherwise afforded no basis to understand why the articles not listed are excluded.

The exclusion of true and good light articles for a malicious purpose is a legitimate legal mechanism for entering into discovery to therein further reveal the

¹⁰ TrentonGarmon.AI

basis of the “weighted factors” which Google may prove to be objective or otherwise which may reveal literal negative algorithm or “Social Score” criteria which inputs malice. Same is not complicated. But a matter of process and right as the allegations are by law deemed to be accepted as true. Plaintiffs maintain the allegations of social score or negative algorithm elements based upon malicious factors is real - apparent - and actionable. These are jury issues for intentional exclusion of a positive light is not different than casting a false negative light wherein same can be shown as part of a patent algorithm.

Therefore, the Court should not allow Google the corporate defendant to pull the wool over Her eyes for Lady Liberty and Ma’dam Justice recognize the difference digital gateways and cited defense applications by Google. Google, the corporate defendant, was sued not merely for one of the three. But the complaint clearly states all three functions of the platform which are three separate gateways have breached a civil law.

The Plaintiffs do, thus move for summary judgment, to the extent that a law and fact specific finding is made as self-acknowledged by Google’s counsel:

(1)Google has self-identified as a “*News Summation*” or “*News*” site in Its Motion to Dismiss while in Tech Mag releases and online it

purports to be Genetivi AI or Intelligence Search Algorithm¹¹, as Defendant appears to allege to be both, with a news results algorithm which is different and distinct from the general search algorithm,

- (a) Thereon that Google does not include the “Holy Water” case in the news summation of AL.com regarding the professional services of Trenton Garmon ...
- (b) Thereon that Google includes a two line “Article” linked to Above the Law which is not traditional news rather simply says: “Stephanie Ruhle Shows How White Allies Are Supposed To Act By Live-Dragging Trent Garmon, Roy Moore's Lawyer. Trent Garmon tried to come at Ali Velshi with some dog-whistle bigotry, but the co-host was having none of it.”
- (c) Thereon that Google does not include the “Prescription” or “Medical Marijuana” press release thus for a fact to be determined by the Jury as to what “algorithm basis” the exile of this article from the “News” section despite being ran on AL.com is not a dispute of fact.

(2)Google has self-identified as a “**Knowledge Panel**” displaying company to the extent that it provides demographic information upon which it maintains a first and primary oversight ability to modify and control with or without a “Claim this Panel” request of the individual or business upon which this Panel displays making it now a mere Communication Decency issue but one of direct control in this regard. This is a “Hosting” of information as the cells are directly inputted by the user on the Google Platform and the information is not housed on a Third-Party site.

¹¹ “Greedy best-first search” is another term utilized to describe the Algorithm which may shed light on the intentions masks by “factors” weighed in the Social Scoring system of the Platform for the two main searches - General and News. “Greedy best-first search is an informed search algorithm where the evaluation function is strictly equal to the heuristic function, disregarding the edge weights in a weighted graph because only the heuristic value is considered. Apr 22, 2023 <https://www.codecademy.com>”

- (a) Thereon that Garmon has “Claimed this Knowledge Panel” and that Google refuses to make certain changes regarding the status of his marriage,
 - (b) The Garmon minors are linked to Trenton Garmon as their biological, legal and natural father.
- (3) Google has self-identified as being the owner, profiteer and responsible for a **Search Engine response algorithm** which provides **general responses**. Meaning Google has admitted that it maintains a separate and distinct search algorithm for the general searches generated upon its platform from that of Google News.
- (a) Thereon the Google Platform lists that Garmon has a “Drug Charge” arrest news article listed in the general search engine result which does not also listing and suppressing from the same page the “Prescription Medication Notice” included in the press release published by AL.com the same outlet or at all,
 - (b) Thereon the Google Platform lists that Garmon has a “racial remark” article listed on the general search engine portion of the Platform which is an attack article of LEO, inaccurate and untrue. A responsive article confirming Garmon made zero racial slurs and literally made the remark of “slave” regarding Mass Incarceration specifically the cases he advocates and about himself being subjected to an unlawful arrest.
 - (c) Thereon that Google does not include the “Holy Water” case of AL.com regarding the professional services of Trenton Garmon.
 - (d) Thereon that Google includes a two line “Article” linked to Above the Law which is not traditional news rather simply says: “Stephanie Ruhle Shows How White Allies Are Supposed To Act By Live-Dragging Trent Garmon, Roy Moore's Lawyer. Trent Garmon tried to come at Ali Velshi with some dog-whistle bigotry, but the co-host was having none of it.” Google claims this is a News article simply hyperlinked while

Garmon claims it is an malicious, “fake news” post tortious and lacking actual news content.

- (e) Thereon that Google does not include the “Prescription” or “Medical Marijuana” press release thus for a fact to be determined by the Jury as to what “algorithm basis” the exile of this article from the “News” section despite being ran on AL.com is not a dispute of fact. Garmon maintains even the Birmingham VA has records of all his medications from the time of growth Hormone Treatment at UAB¹² to the use of Medical Cannabis which was a legal prescription issued by Florida at the time of arrest.

WHEREFORE premises considered this the 08th day of December 2023, the Plaintiffs do move for a Partial Summary Judgment.

s/ Trenton Garmon

TRENTON GARMON, Pro Se Dad & Natural
Guardian for Sydney Marie Garmon, Judah
Michael Garmon, Josiah Rogers Garmon, Sarah
Grace Garmon & James Leon Garmon

CERTIFICATE OF SERVICE: I hereby certified that a copy of the foregoing and all filings have been served upon the Defendants by U.S. Mail postage prepaid this the date of filing.

James P. Pewitt, Esquire

James P. Pewitt LLC
2 20th Street North, Suite 925
Birmingham, Alabama 35203
Telephone: 205-874-6686
jim@jamespewitt.com

¹² B22 - Veterans Affairs Records - Red Clinic - confirm the underlying conditions upon which the Medical Cannabis prescription was issued which is private medical information forced into the public eye.

Eric P. Schroeder, Esquire
Bryan Cave Leighton Paisner LLP
1201 West Peachtree Street, NW
One Atlantic Center, 14th Floor
Telephone: 404-572-6600
Facsimile: 404-572-6999
eric.schroeder@bclplaw.com

s/ Trenton Garmon
TRENTON GARMON, Pro Se Dad & Natural
Guardian